

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JASON VALDES, and
NELSON TORRES TORRES

Defendant.

25 MAG 397**SEALED COMPLAINT****3:25-138 (M)**

Violations of 21 U.S.C. § 846

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

JAMON PARHAM, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service (“USPIS”), and charges as follows:

COUNT ONE
(Conspiracy to Distribute Narcotics)

1. From at least in or about February 2023 to in or about October 2023, in the Southern District of New York and elsewhere, JASON VALDES and NELSON TORRES TORRES, the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JASON VALDES and NELSON TORRES TORRES, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Postal Inspector with USPIS, and I have been a Postal Inspector with USPIS for approximately 12 years. I have been personally involved in this investigation. This affidavit is based on my involvement in this investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents

of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my personal observations, my conversations with other law enforcement officers, and my review of United States Postal Service (“USPS”) records and Drug Enforcement Administration (“DEA”) lab reports, I have learned, among other things, the following:

a. In late 2022, USPIS and the DEA (“the “Investigating Agencies”) began investigating a pattern of suspicious parcels (the “Pattern”) that were being mailed from Puerto Rico to Pennsylvania, Massachusetts, Florida, and New York. The commonality between all the suspicious parcels was the use of what appear to me, based on my training and experience, to be fictitious businesses all using addresses at the same company that rents commercial office space at various physical locations (“Company-1”) to receive the suspicious parcels. The suspicious parcels listed as their senders these businesses using Company-1 virtual office addresses in states including Pennsylvania, Massachusetts, Florida, and New York, even though I know, from my review of postal records, that all the mailings originated from Puerto Rico.

Parcel-1

b. On or about February 25, 2023, law enforcement seized a parcel (“Parcel-1”) fitting the Pattern. Parcel-1 was addressed to a Company-1 virtual office in the White Plains, New York.

c. On or about March 3, 2023, the Honorable James L. Cott, United States Magistrate Judge, issued a warrant authorizing law enforcement agents to search Parcel-1. Pursuant to that warrant, law enforcement agents searched Parcel-1 and found inside a box within Parcel-1 two bricks of white powdery substance that collectively weighed approximately two kilograms. A sample of the substance tested positive for the presence of cocaine. Below is a photograph of the bricks of cocaine found inside Parcel-1:



d. Based on my review of laboratory reports of fingerprints taken from Parcel-1, I have learned that fingerprints of JASON VALDES, the defendant, were recovered from the exterior of Parcel-1, as well as from bubble wrap located on the inside of Parcel-1.

Parcel-2

e. On or about April 24, 2023, law enforcement seized a parcel (“Parcel-2”) fitting the Pattern. Parcel-2 was addressed to a Company-1 virtual office in the Manhasset, New York.

f. On or about April 24, 2023, the Honorable Peggy Kuo, United States Magistrate Judge, issued a warrant authorizing law enforcement agents to search Parcel-2. Pursuant to that warrant, law enforcement agents searched Parcel-2 and found inside a box within Parcel-2 two bricks of white powdery substance that collectively weighed approximately two kilograms. A sample of the substance tested positive for the presence of cocaine. Below is a photograph of the bricks of cocaine found inside Parcel-2:



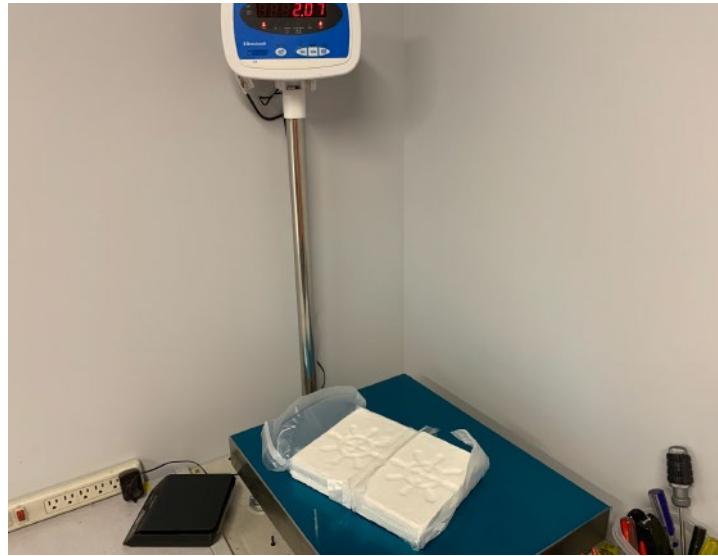
g. A fingerprint analysis identified the fingerprints of NELSON TORRES TORRES, the defendant, on the exterior of the box inside Parcel-2.

Parcel-3

h. On or about May 6, 2023, law enforcement seized a parcel (“Parcel-3”) fitting the Pattern. Parcel-3 was addressed to a Company-1 virtual office in White Plains, New York.

i. On or about May 15, 2023, the Honorable James L. Cott, United States Magistrate Judge, issued a warrant authorizing law enforcement agents to search Parcel-3. Pursuant to that warrant, law enforcement agents searched Parcel-3 and found inside a box within Parcel-3 two bricks of white powdery substance that collectively weighed approximately two

kilograms. A sample of the substance tested positive for the presence of cocaine. Below is a photograph of the bricks of cocaine found inside Parcel-3:



j. A fingerprint analysis identified the fingerprints of VALDES on the exterior of Parcel-3.

Parcel-4

k. On or about July 17, 2023, law enforcement seized a parcel (“Parcel-4”) fitting the Pattern. Parcel-4 was addressed to a Company-1 virtual office in Hicksville, New York.

l. On or about July 31, 2023, the Honorable James L. Cott, United States Magistrate Judge, issued a warrant authorizing law enforcement agents to search Parcel-4. Pursuant to that warrant, law enforcement agents searched Parcel-4 and found inside a box within Parcel-4 two bricks of white powdery substance that collectively weighed approximately two kilograms. A sample of the substance tested positive for the presence of cocaine. Below is a photograph of the bricks of cocaine found inside Parcel-4:



m. A fingerprint analysis identified the fingerprints of VALDES on the exterior of Parcel-4.

n. Based on my review of USPS surveillance video, I have learned, among other things, that the person who mailed Parcel-4 (the “Parcel-4 Mailer”) mailed the parcel from a post office in Caguas, Puerto Rico (the “Caguas Post Office”). Based on my review of surveillance video from the Caguas Post Office and my review of photographs of VALDES in databases maintained by law enforcement and the Department of Motor Vehicles (“DMV”) as well as passport photographs of VALDES, and I believe that the Parcel-4 Mailer is VALDES. Below is a DMV photograph of VALDES (left) and a still image of from surveillance video depicting the Parcel-4 Mailer (right):



Parcel-5

o. On or about July 24, 2023, law enforcement seized a parcel ("Parcel-5") fitting the Pattern. Parcel-5 was addressed to a Company-1 virtual office in New Rochelle, New York.

p. On or about July 31, 2023, the Honorable James L. Cott, United States Magistrate Judge, issued a warrant authorizing law enforcement agents to search Parcel-5. Pursuant to that warrant, law enforcement agents searched Parcel-5 and found two bricks of white powdery substance that collectively weighed approximately two kilograms. A sample of the substance tested positive for the presence of cocaine. Below is a photograph of the bricks of cocaine found inside Parcel-5:



q. Based on my review of laboratory reports of fingerprints taken from Parcel-5, I have learned that fingerprints of VALDES were recovered from plastic packaging found inside Parcel-5. A fingerprint analysis also identified the fingerprints of TORRES on the exterior and interior flaps of a box found within Parcel-5.

Parcel-6

r. On or about October 17, 2023, law enforcement seized a parcel ("Parcel-6") fitting the Pattern. Parcel-6 was addressed to a Company-1 virtual office in Orlando, Florida. The sender information from Parcel-6 was identical to the recipient information from Parcel-2.

s. On or about October 25, 2023, the Honorable Leslie Hoffman Price, United States Magistrate Judge for the Middle District of Florida, issued a warrant authorizing law enforcement agents to search Parcel-6. Pursuant to that warrant, law enforcement agents searched Parcel-6 and found one brick of a white powdery substance that weighed approximately one

kilogram. A sample of the substance tested positive for the presence of cocaine. Below is a photograph of the brick of cocaine found inside Parcel-6:



t. Based on my review of USPS surveillance video, I have learned, among other things, that the person who mailed Parcel-6 (the “Parcel-6 Mailer”) mailed the parcel from a post office in Fajardo, Puerto Rico (the “Fajardo Post Office”). Based on my review of surveillance video from the Fajardo Post Office and my review of photographs of VALDES in databases maintained by law enforcement and the Department of Motor Vehicles (“DMV”), I believe that the Parcel-6 Mailer is VALDES. Below is a still image of from surveillance video depicting the Parcel-6 Mailer (right):

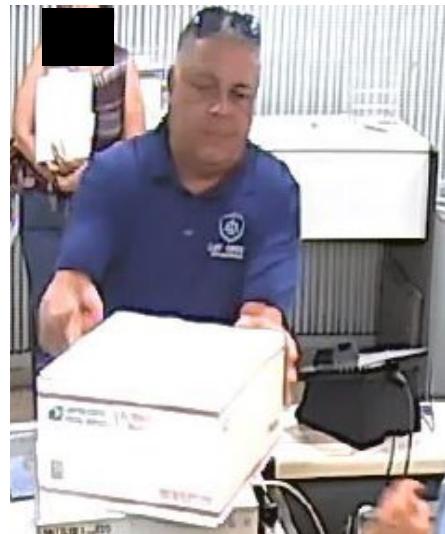


Other Parcels

2. Based on my participation in this investigation, I know that between in or about April 2023 and in or about November 2023, 17 additional parcels (the “Additional Parcels”) fitting

the Pattern were mailed from post offices in Puerto Rico to Company-1 virtual offices in New York, Pennsylvania, and Florida.

a. Based on my review of surveillance video from the post offices in Puerto Rico where the Additional Parcels were mailed and my comparison of that video to photographs of JASON VALDES, the defendant, from law enforcement and DMV databases, I believe that the mailer of five of the Additional Parcels is VALDES. Below are still images of from surveillance video depicting the mailer of five of the Additional Parcels:





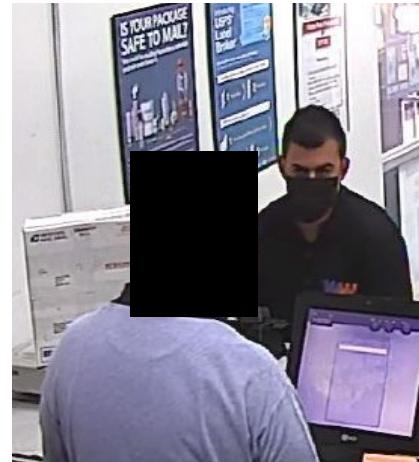
b. Based on my review of surveillance video from the post offices in Puerto Rico where these packages were mailed, my review of photographs of NELSON TORRES TORRES, the defendant, from DMV databases, and my review of photographs of TORRES from a public Facebook account, I believe the mailer of 12 of the Additional Parcels is TORRES because (1) the person who mailed the parcels wore dark shirts bearing a distinctive “WW” logo and had a particular short haircut that matched TORRES’s haircut in photographs of him from a public Facebook page; and (2) in certain of the surveillance videos, the individual who mailed the parcels is seen with a distinctive tattoo on his forearm that matches a tattoo that TORRES has on his forearm and while wearing the same dark shirt bearing the “WW” logo and the same particular haircut.

c. Below is a DMV photograph of TORRES (left) and photographs of TORRES from a public Facebook account, which depicts a distinctive tattoo on his forearm (right):



d. Below are still images of from surveillance video depicting the mailer of 12 of the Additional Parcels:





WHEREFORE, I respectfully request that warrants be issued for the arrest of JASON VALDES and NELSON TORRES TORRES, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

s/ Jamon Parham /otw

JAMON PARHAM
Postal Inspector
United States Postal Inspection Service

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 4th day of February, 2025.



THE HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York